

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

**INDUSTRIAL ACCESS INC.**

Plaintiff,

v.

**PRAETORIAN HOLDINGS GROUP LLC,**

Defendant.

CASE NO. 22-CV-626

JUDGE JOHN L. SINATRA, JR.

MAGISTRATE JUDGE MICHAEL J.  
ROEMER

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**DEFENDANT PRAETORIAN HOLDINGS GROUP LLC'S  
NOTICE OF ITS LIMITED MOTION TO SEAL PORTIONS OF PLAINTIFF  
INDUSTRIAL ACCESS INC.'S COMPLAINT AND EXHIBITS**

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PLEASE TAKE NOTICE that, upon the accompanying Motion and Memorandum of Law in Support of limited Motion to Seal Portions of Plaintiff Industrial Access Inc.'s Complaint and Exhibits, Defendant Praetorian Holdings Group, LLC ("PHG"), by and through their undersigned counsel and pursuant to Loc. R. Civ. P. 5.3, hereby moves this Court before Honorable Judge John L. Sinatra, Jr., on a date and at a time to be designated by the Court, for an order sealing limited portions of Plaintiff Industrial Access Inc.'s ("Plaintiff") Complaint and accompanying Exhibit A. In support of this motion, PHG is submitting contemporaneously a memorandum in support. Plaintiff's counsel has stated that Plaintiff will not oppose PHG's Motion to Seal.

Dated: January 17, 2023

Respectfully submitted,

/s/ Justin M. Lovdahl

Deana S. Stein (DS 5047)

Jonathon Korinko (*pro hac vice*)

Justin Lovdahl (*pro hac vice*)

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*Counsel for Defendant Praetorian  
Holdings Group, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2023 a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Justin M. Lovdahl

Justin M. Lovdahl  
*Counsel for Defendant*